

45527 3rd Street East  
Lancaster, California 93535-1802  
8 September 1992

DKTS

Federal Communications Commission  
Personal Radio Branch  
1919 M Street N.W.  
Washington, DC 20554

Subject: Proposed Change to Part 97

Dear Sir:

I believe the 30 meter band should be made available to Novice and Technician-Plus amateurs as quickly as possible. My reasons are stated herein.

The 10 meter band is almost useless at this point in the sunspot cycle, and that condition will not change for years.

The 15 meter band now opens later and it closes earlier than in the recent past. Additionally, this band is now very subject to fast fading (QSB). In summary, this band is not very useful to Novice and Technician-Plus operators.

The 40 meter Novice band is now less useful because the f.o.t. (frequency optimum transmission) is frequently close to this frequency range, causing international shortwave broadcast stations to have stronger received signals here in America. The unfortunate result of this situation is that Novice and Technician-Plus amateurs experience more interference from international shortwave broadcasts. The usefulness of this band continues to decline. The communications range of this band is very limited around the middle of the day and shortwave broadcasts dominate this band evenings. This band is not available to amateurs in ITU Region I and III. It is only used by ITU Region II amateurs, which greatly reduces the number of operators (and countries) one could contact on this band. The 40 meter Novice band has very little to offer.

The 80 meter Novice band is more useful since it was moved down 25 kHz. However, the longer antennas that are required to operate on this band limit its appeal to many amateurs. The communications range is very short on this band around noontime.

In summary, about half of our American amateurs (Novice and Technician-Plus) have very limited operating opportunities. They need the 30 meter band, which already features their operating restrictions/privileges.

RECEIVED  
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FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

RM 80913

I strongly disagree with the contention that Novice "Incentive Licensing" and the Code-Free Technician license are benefitting the Amateur Radio Service. I believe that extending voice privileges to Novices simply lured thousands of them to voice operation on 10 meters, reducing the possibility that they would acquire the increased code proficiency that is needed to upgrade to General (or higher) class licenses. The establishment of the Code-Free Technician license just about killed any remaining interest in acquiring the Novice ticket. We now have thousands of amateurs who are unlikely to earn a General (or higher) ticket, and I'm sure that many of them have quit operating now that 10 meter band conditions are terrible.

I have conducted licensing courses since 1948. I spend a lot of time helping new amateurs set up their first stations and make their first few contacts. I know the Novice/Technician situation quite well.

Sincerely,

*William G. Welsh*

William G. Welsh - W6DDB  
805-948-8493

copies:     ARRL  
              FCC  
              W5YI Newsletter  
              W6DDB File

L. WELSH:

# Amateur Radio's 'Man of the Year'

Bill Welsh, engineering writer in Glendale Publications received national acclaim recently, when he was named winner of the 1961 Edison Radio Amateur Award for outstanding public service.

A comparative newcomer to California—he joined Librascope last December—the stocky, soft-spoken New Englander has devoted nearly 30 hours over the past 10 years to organizing and conducting free radio classes to better than 2800 people—young and old alike. *PER WELSH*

The award, sponsored by General Electric Company, is considered to be the "Nobel Prize" for amateur radio operators. It is awarded yearly to an individual who has performed an outstanding or meritorious service in behalf of an individual, group, or general public.

Welsh was chosen from among 22 candidates across the nation as the tenth winner of the award by a panel of judges consisting of Commissioner Rosel Hyde of the Federal Communications Commission, E. R. Harriman, Chairman of the Board of the American National Red Cross, and G. L. Doslund, President of the American Radio Relay League—the amateur radio operators' national organization.

Welsh was nominated for the award by several individuals in the Boston area, including the engineer-in-charge of the Boston FCC office, the director

of a vocational high school, and a Catholic priest.

Squeezed somewhere in between his regular job and his after-work instruction courses, Welsh found time to develop a 91-page instructor's handbook to help other radio teachers. He also developed and distributed a series of tape recorded courses of instruction for use by his students and by study groups throughout the U.S. and in 12 foreign countries. More than 75 per cent of the students have passed Welsh's course, considered a high ratio in the radio field.

A special area of interest to Welsh is radio instruction for the blind. Already, many of his blind students have received their amateur radio licenses. He presently has a series of specially taped courses awaiting acceptance by the Library of Congress.

In addition to his voluntary instruction which, at times, extended to seven nights a week, Welsh taught a radio class at Massachusetts Institute of Technology, sponsored by the State Dept. of Education. It was the only course for which he was paid, and characteristically, he used the money to buy duplicating equipment and materials to further his voluntary teaching efforts.

His public services activities, however, extend beyond the continental confines of the United States. One of his most gratifying efforts has been the development of a communications network among missionary groups in South America.

Welsh not only set up the only communications link—an amateur radio system—between the groups and their United States headquarters, but also sent them equipment and parts that were available only in the U.S.

Installation of the missionary network, located in Peru and Bolivia, was directed by Welsh via correspondence with the Carmelite and St. James the Apostle religious orders.

Both the governments of Peru and Bolivia have licensed the missionary radio stations to operate on regular frequencies on which they have aired a series of educational programs.

In the tragic Peruvian landslide earlier this year, which took the lives of thousands of villagers, it was one on the Welsh-inspired missionary stations that first beamed news of the catastrophe to the outside world.

At his home in Burbank, Bill is only one of three licensed amateur radio operators. His wife, Marie (who has



BILL, MARIE AND RICHARD WELSH  
They Make Amateur Radio a Family Affair

also aided Bill in his instruction program), and his oldest son, Richard, 12, are also "ham" radio operators.

Bill operates station WA6VTL, Marie has station WA6VTM, and Richard's call letters are WA6VTN. Other members of the Welsh clan who will undoubtedly take up the fascinating pastime include Lois, 11, Marie, 9, Billy, 7, and one-year-old Carl.

## While in Washington

In addition to a trophy, a \$500 cash award, and guest-of-honor at a gala presentation banquet at the Sheraton-Carlton Hotel on March 1, Bill Welsh also saw and participated in a host of other activities during his five-day stay in the nation's capitol.

He and his wife, Marie, were given a special tour of the White House, the Government Printing Office and the Library of Congress. During his visit to the Library of Congress, he witnessed the transcription of one of his special instruction tapes for the blind.

During his visit to Congress, he had the privilege of addressing the 16-member Senate Commerce Committee for ten minutes. His topic: Senate Bill 2361, a reciprocal licensing bill, allowing foreigners in this country to operate licensed amateur radios.



TROPHY PRESENTED—Bill Welsh is shown receiving the Edison Radio Amateur Award at the March 1 presentation banquet in Washington. L. B. Davis, General Electric Vice-Pres. presented Welsh with the trophy and a \$500 cash award.



MEMORIAL AWARD

PRESENTED TO  
WILLIAM E. WELSH  
WESLEY WAGNER WELSH

A. R. R. L.

CONVENTION AND ASSOCIATION

452 East Palm Avenue  
Burbank, California 91501  
28 March 1975

Federal Communications Commission  
Washington, D. C. 20554

Subject: "Restructuring" Docket 20282

Attention: Secretary

Dear Sir:

The subject docket contains several items which could have a major effect on our Amateur Radio Service. This letter (with the usual 14 copies) is just concerned with changes related to Novices. I've added capitalized headings to make it easier to locate specific subjects and I'm attaching copies of related past letters to the original (only) of this letter.

#### QUALIFYING BACKGROUND

I work with a few hundred new hams each year in licensing courses I instruct, plus in related club activities. I've helped several thousand hams get started in the past two decades. Very few people have been closer to the Novice situation for the past 24 years than myself. I continue to have a great desire to make the Novice license a better doorway to our Amateur Radio Service, plus to related learning and work experiences.

#### TEN METER NOVICE BAND

I previously suggested the establishment of a 10-meter Novice band in letters sent to the FCC. I am pleased that this band has been established and I believe it will prove to be extremely active as sunspot conditions start to improve.

#### TWENTY METER NOVICE BAND

I've recommended the establishment of a 20-meter Novice band in previous letters to the FCC. The need for this band has never been more obvious than it is at this time. When 10 and 15 meter Novice bands are "out" at night, Novices are forced to operate on 80 and 40 meter bands under very poor conditions. There are extremely powerful international broadcasting stations at every even 5 Kilohertz point in the 40-meter Novice band, making this band almost completely unuseable to Novices with limited receiving apparatus and capability. At these times of lowered maximum useable frequency, the 80-meter Novice band also suffers from increased interference by ham radio voice operations in neighboring countries. Consequently, when 10 and 15 meters are not useful, the Novice is also subjected to more interference on his 80 and 40 meter bands. The establishment of a 20-meter Novice band would greatly improve the Novice's operating opportunities throughout each day and night. The frequency spectrum of 14.1-14.2 Megahertz remains virtually unused by American hams, apparently due to the FCC's reticence to let American hams move into this bastion of foreign

voice operations. Amateur radio is international in scope by its very nature and it seems unreasonable to deny American hams equal use of any ham spectrum strictly for the benefit of foreign hams. The ever-increasing higher total of foreign hams in the world's ham population makes protective segregated frequencies less useful with time. A segment of 14.1-14.2 Megahertz should be used to benefit the ham who needs it most, the Novice.

#### HARMONICALLY-RELATED NOVICE BANDS

Some of my previous proposals to the FCC have recommended the establishment of Novice bands which are harmonically related. I am convinced that the Novice should have harmonically-related bands on 40, 20, 15, and 10 meters. Despite the obvious advantages of the recently adopted Novice VFO privileges, I still find that about half the Novices continue to operate crystal control because it is less expensive. The establishment of harmonically-related Novice bands would enable the Novice to operate all four proposed bands with each crystal. Novices presently have to purchase separate crystals for 80, 40, and 15 meter operation; a few (low end) 15-meter crystals can also be used on the present 10-meter Novice band. Reduced crystal costs would encourage Novices to operate on all bands and I've found that multi-band operation is beneficial towards developing their interests and skills. I believe that the 80-meter Novice band could be abandoned since its relatively large antennas present a major problem to beginning hams. The new 40-meter Novice band should be 7040-7070 Kilohertz, with exact multiples used for Novice bands on 20 meters (14,080-14,140), 15 meters (21,120-21,210) and 10 meters (28,160-28,280). These new Novice bands would maintain total Novice spectrum at its present level of 300 Kilohertz. It should be borne in mind that total Novice spectrum was reduced from 2250 to 300 Kilohertz by recent changes.

#### NOVICE LICENSE TERM AND RENEWAL

The recent increase from a 1-year to a 2-year (maximum) Novice license term is beneficial. It had long been a sad fact that many aspiring Generals found an additional roadblock in their way when their Novice licenses expired just as they were about ready to take their General exams. When these fellows were forced off the air, they lost their best opportunity to maintain or increase required code proficiency. The advent of the 2-year Novice license has resulted in a higher percentage of our students progressing to the General/Advanced license, and in less total time. I am sure that it would not be beneficial to either increase the Novice license term to 5 years nor to make the Novice license renewable. I have no doubt that either of these changes would be detrimental to the existing successful built-in upgrading requirement. The Novice license provides an excellent gateway to our Amateur Radio Service and two years is adequate time for one to progress to a General/Advanced license to stay on the air.

#### AVAILABILITY OF NOVICE LICENSE TO PREVIOUS HAMS

The recent change which allows one to apply for a Novice license, after not holding any class of amateur license for at least one year, is a welcome

improvement. It never seemed reasonable to me to (in effect) deny a Novice license to someone who had previously expressed enough interest to obtain a ham ticket. Family or work problems sometimes prevent a Novice from progressing to a General/Advanced license in the usual time span. The continued implementation of the re-eligibility rule is another factor which makes the 5-year renewable Novice license unnecessary.

#### NOVICE LICENSE SUSPENSION AT TIME OF UPGRADING

Another problem which needs correction is the practice of taking a Novice's original license away from him when he passes an exam for a higher class amateur license. This undesirable practice keeps the Novice off the air 3 to 8 weeks while he waits for his new license to be issued and mailed to him. I know it is disheartening to these people to be forced off the air at a time when they are enthused by having upgraded to a higher license. It seems reasonable to allow the successful applicant to continue operating at his old/lesser privileges until his new ticket is received. Since the present Novice license can't be upgraded or renewed, it seems that the Novice licensee should be allowed to retain his original license and to operate under it until his new one is received; simple supersedure by the higher class license should suffice. It seems that this problem is common to all but the Amateur Extra Class License and that a standard notation could be added to each license (other than Extra) stating that it is automatically cancelled upon issuance and receipt of a higher class license in the same category. My students are taught that they must have their original licenses with them to operate. Unfortunately, I often hear other Novices continuing to operate after they've turned in their original licenses with General/Advanced applications.

#### CODE EXAMINATION CREDIT

As I've stated in previous letters, I believe that an applicant who passes the code tests, but fails the associated written examination, should be granted a 100-day code credit recognition. This applicant should not have to take the same code tests when applying for a license anytime in the following 100 days. I believe that this change would enhance the applicant's chances of passing the associated written exam since there would be no need to prepare to take the same code tests again.

#### REQUIRED CODE SYMBOLS

It is reasonable to assume that the beginning ham should be able to look in Part 97 and find each code symbol listed that he must know as part of ham code exams. However, this is not the case. I've been told that just the letters (A-Z), numerals (1-0), worksigns (AR, BT, SK, K) and punctuation marks (? . , /) can be included in FCC ham code tests, but this information does not appear in the rules.

#### CODE SENDING APPARATUS

If semi-automatic keys (bugs), electronic keyers, and code keyboards (typewriters) are not allowed to be used during Novice code sending tests, the rules should clearly prohibit them.

## EQUAL EXAMINERS

I am against any change which would require the simultaneous presence of two qualified examiners to conduct volunteer FCC examinations. I've conducted thousands of Novice exams and all have been completely proper. I do not believe that any club licensing instructor would allow anyone to improperly become a licensed ham. From a practical viewpoint, I've had enough trouble arranging mutually satisfactory examination appointments between each student and myself; I believe these problems would be doubled if an additional volunteer examiner were required.

## CLUB EXAMINATIONS

I've had students tell me things which lead me to believe that some volunteer examiners do not conduct exams properly. I believe it would be in the best interests of the Amateur Radio Service to only conduct volunteer FCC exams under the auspices of amateur radio clubs. Clubs are uniquely able to conduct these exams in a relaxed but efficient manner. With more than 1200 ham radio clubs conducting amateur radio licensing programs, they are a natural choice to conduct the related FCC examinations. There is no doubt in my mind that club people who donate their time and effort to helping new hams are not of such poor caliber that they would stoop to poor examination practices. Clubs could take a large workload off local FCC field offices by conducting all but Amateur Extra Class License examinations. It should be relatively simple for an FCC office to track the examination performance of each participating local club.

## REDUCING LICENSING DELAY FOR NOVICES

Whether volunteer examinations are to be handled thru clubs or individuals, the licensing delay should be reduced by providing "regular" volunteer examiners with a 3-6 months supply of the written FCC exams. An applicant presently has to endure two separate 3-8 week delays in the volunteer licensing procedure. He first has to wait for the written exam to be sent to his volunteer examiner, after he passes the code receiving and sending tests. Then, he has to wait for the FCC to issue his license and send it to him, after he completes the written exam. The sad result is that an enthusiastic prepared "Novice" has to wait 6 to 16 weeks before he can get on the air as a licensed ham, and I've seen times when it was much longer. Furnishing written exams to volunteer examiners for use on an as-needed basis would at least cut this unfortunate delay in half. I've operated in this manner in the Boston area and it proved to be very successful.

## NOVICE INPUT POWER

The existing 75-watt maximum input power limitation to the final(s) of a Novice's transmitter is not necessary. Many of the rigs available for Novice use run 100-150 watts input and it seems reasonable that the Novice input power could be raised to 200 watts without creating serious problems. I believe that the 250-watt level recommended in Docket 20262 is higher than is needed.



## NOVICE VOICE OPERATION

Docket 20282 includes a brief mention of Novice 2-meter voice operation. I am strongly opposed to Novice voice privileges on any band. I found that Novice voice operation resulted in many Technicians who would otherwise have been Generals (or higher) if they'd operated more code and less 2-meter voice. Many of these ex-Novices are still Technicians after two decades. I occasionally have a Technician downgrade to a Novice and subsequently upgrade to a General/Advanced after getting the needed on-the-air code practice.

## TECHNICIANS GRANTED NOVICE PRIVILEGES

I've previously advocated extending Novice code privileges to Technicians to help them upgrade to General/Advanced licenses. I'm very pleased to see that this proposal is part of Docket 20282 and I believe that implementation of this change will significantly reduce the percentage of Technician licensees. I do not understand why my 2 November 1971 letter proposing this change is not listed in Docket 20282. However, the most important thing is adopting the change, not giving credit lines. I am generally not in agreement with ARRL or FCC comments about Technicians because I've found that most of them are not satisfied with their niche in the Amateur Radio Service.

## SIGNING WRITTEN EXAMS

Since the Novice written exam is a single sheet folded to form four pages, it seems unreasonable to require the applicant to sign the same piece of paper four places. It would be better to just have a signature requirement on the first page.

## EXAM SERIAL NUMBER

The exam serial number is printed on both the exam envelope and the answer sheet. The use of contrasting red ink is effective in making this number visible. I fail to understand what benefit is derived from requiring both the applicant and the volunteer examiner to transcribe the exam number on the reverse side of the answer sheet which has the same number printed on its front side. A simple note could be added to the exam envelope advising one to check the exam serial numbers on both the envelope and answer sheet to make certain that they are the same.

## ADVISORY COMMITTEE

It appears obvious to me that the FCC needs an active Advisory Committee for the Amateur Radio Service.

I greatly appreciate this extended opportunity to comment on Locket 20282. Due to personal good experiences with the FCC, I have always felt free to tell students to be completely open and honest with your people. You are truly a remarkably responsive group and I appreciate your past excellent cooperation.

Sincerely,

*William G. Welsh*

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William G. Welsh - W6DDE  
Home Telephone 213-848-9340

2814 Empire Avenue  
Burbank, California 91504  
13 December 1980

FCC

Federal Communications Commission  
Bureau of Safety and Special Radio Services  
Amateur and Citizens Division  
1919 M Street  
Washington, D.C. 20554

Subject: Proposed Change to Terms of Amateur Radio Licenses

Dear Sir:

I propose the following changes to Part 97 of the FCC Rules and Regulations. I believe that adoption of these changes would benefit the Amateur Radio Service. I urge you to consider each proposed change and to accept as many of them as possible.

- (1) Change the Amateur Extra class license term from 5 years and renewable to a lifetime term.

Comments:

- (A) Amateur licenses no longer have to be modified when one moves to a different area, making it possible to retain the same callsign anywhere in America.
- (B) The possibility of unintentional failure to renew a license (possibly due to illness) would be avoided.
- (C) This unnecessary renewal procedure would be eliminated.
- (D) FCC records should show that very few Amateur Extra class licensees fail to renew their licenses.

- (2) Change the Advanced class license from a 5 year renewable term to a 10 year renewable term.

Comments:

- (A) See Extra class comments (A) and (B).
- (B) The renewal frequency would be halved.
- (C) FCC records should show a high renewal percentage for Advanced Licenses.

- (3) Retain the existing 5 year renewable term for General and Technician licenses.
- (4) Change the Novice license from a 5 year renewable license to a 3 year nonrenewable license.

Comments:

- (A) This license was accepted on the basis of it being a nonrenewable, short-term introduction to amateur radio using distinctive callsigns.

- (E) I have helped license amateurs since before the advent of the Novice license. My average student has upgraded from Novice to General in just about one year. A 3 year Novice license term provides ample time in which one can upgrade to a higher class license.
- (C) The lack of incentive to upgrade has already caused the number of Novices to surpass the number of Technician licensees. Continuing 5 year renewable licenses will cause Novices to be the largest group in Amateur Radio within a decade.
- (D) If it is the FCC intent to create a no-code CB-type license as part of the Amateur Radio Service, it appears advisable to do so above the VHF bands.

Your attention to the preceding comments will be appreciated.

Sincerely,

William G. Welsh

William G. Welsh - W6DDE  
W6LS Licensing Instructor

Telephones:

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Home 213-848-9340  
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copy: ARRL  
Congressional Communication Committees  
W6DDB FCC File  
W6LS FCC File

2814 Empire Avenue  
Burbank, California 91504  
13 December 1980

Federal Communications Commission  
Bureau of Safety and Special Radio Services  
Amateur and Citizens Division  
1919 M Street  
Washington, D.C. 20554

Subject: Amateur Radio Operating Privileges

Dear Sir:

I propose changing Part 97 of the FCC Rules and Regulations to expand the operating privileges of amateur Extra class licensees. I believe that this change would create more interest in upgrading to the amateur Extra.

When considering operating privileges, emission modes must be considered in addition to frequency spectrum. The megahertz-mode high frequency (3-30 MHz) operating privileges are presently as follows:

<u>License Class</u>	<u>MHz-Mode Privileges</u>	<u>% of Maximum</u>
Novice	0.300	4
Technician	0.300	4
General	5.670	81
Advanced	6.630	95
Extra	6.965	100

The preceding figures show that the greatest improvement in HF operating privileges (77%) occurs when one upgrades to General. There is a 14% increase in operating privileges when an amateur upgrades from General to Advanced, really just amounting to extending slow-scan TV spectrum to advanced licensees with no useful increase in code spectrum. When an amateur upgrades from Advanced to Extra, the increase in operating privileges is just 5 %, which does not provide a major incentive to upgrade.

I propose reducing the General class operating privileges, changing Advanced privileges and increasing Extra class privileges as follows:

Code

Reserve the bottom 30 Kilohertz of the 80, 40, 20, 15, and 10 meter bands for Extra.

Reserve 30 to 50 Kilohertz from the bottom end of 80, 40, 20, 15, and 10 meters for Extra and Advanced.

Voice

Reserve 3800-3850, 7150-7200, 14200-14225, 21250-21300 and 28500-28750 Kilohertz for Extra.

Reserve 3850-3900, 7200-7225, 14225-14275, 21300-21350 and 28750-29000 Kilohertz for Extra and Advanced.

I believe that portions of 10 meters should be reserved for Advanced and Extra class licensees, as are the 15 thru 80 meter bands. Also, it has been my experience that most amateurs already believe that the bottom 25 kilohertz is reserved for the Extra.

Sincerely,

William G. Welsh

William G. Welsh - W6DDB

1324 North Reese Place  
Burbank, California 91506  
8 August 1983

Federal Communications Commission  
1919 M Street, N. W.  
Washington, D.C. 20554

Subject: Proposed Change to the Amateur Radio Service Regulations

Attention: FCC Commissioners.

Dear Sirs:

I have conducted amateur radio operator licensing courses one to three times each year since 1948. I continue to instruct these courses and I remain in close contact with the problems experienced by new amateurs.

Novice and Technician licensees now comprise more than forty percent of the American amateur radio operator population. However, they only have access to nine percent of the amateur spectrum in the high frequency ( 3 to 30 Megahertz ) bands. During prime evening operating times, the ten and fifteen meter Novice bands currently become useless for long distance contacts and, shortly after the 15 meter band dies, the 40 meter Novice band is rendered almost useless by ITU Region I and Region III international shortwave broadcast stations located at five Kiloherzt intervals (7105, 7110 kHz, etc.). When this occurs, 80 meters becomes the only useful HF communications band that is available to about 160,000 Novice/Technician licensees. This situation requires correction. I suggest the following changes to the so-called Novice bands:

10 meters - Leave as is. It will be great again after the 1987 low point. 28,100-28,200 Kiloherzt suffices.

15 meters - Leave as is. 21,100-21,200 kHz suffices.

20 meters - 14,100-14,150 kHz should be established as a new Novice band. It is urgently needed to provide excellent long distance communications opportunities during most of the day and night. The 250 watt limitation should minimize foreign amateurs' objections to code operation in this frequency segment. 14,100-14,200 kHz has too long been the exclusive domain of foreign amateurs. The recent change which opened up 14,150-14,200 kHz to use by American amateurs was a step in the right direction. It was also part of one of my recent proposals that was rejected. Under the present circumstances, 14,100-14,150 kHz still remains essentially the private domain of foreign amateurs. Using this spectrum as a Novice band will open it up to American amateurs.

- 30 meters - As soon as the current segment restriction is removed, make the entire 10.10 - 10.15 Megahertz segment a new Novice band. Operation on this band is already restricted to just mode A-1 radiotelegraphy, and the 250 watt \* Novice bands power limitation already exists. This band will be particularly useful when strong shortwave broadcasts make the 40 meter Novice band almost useless to ITU Region II (Americas) amateurs.
- 40 meters - Extend the bottom edge 25 Kiloherzt below its present limit, producing an enlarged Novice band at 7075-7150 kHz. This change will give American Novice/Technician licensees 25 kHz where they cannot be drowned out by powerful shortwave broadcast stations. It will also provide 25 kHz of spectrum where these licensees will be able to contact foreign amateurs in ITU Regions I and III, who only have 7000-7100 kHz available to them. The existing 40 meter Novice band has no spectrum that can be operated by amateurs outside the Americas (ITU Region II). \*
- 80 meters - This Novice band has been 3700-3750 kHz since the Novice license came into use in July of 1951. It is not as popular as other Novice bands due to the larger antennas required. However, this is a useful band and it is popular with many Novice/Technician licenses. Interference with foreign (Canadian, for example) voice operation is common in the upper portion of this band. Extending the lower edge of this band 25 kHz would make this a more useful Novice band. I recommend 3675-3750 kHz as the 80 meter Novice band.

Implementing the preceding changes would provide Novice/Technician licensees with access to 450 of the 3350 Kiloherzt of amateur H-F spectrum, which is still less than fourteen percent. Of more importance than the spectrum percentage, this 50 percent increase in Novice H-F spectrum provides access to frequencies that are at their peaks during prime evening operating hours. Our Novice/Technician licensees need good evening communication frequencies to encourage them to operate, which will increase code proficiency and help them prepare to upgrade in license class.

I find it interesting to note the many points from my previous proposals have now been accepted, or are currently being considered for adoption. This is interesting because my associated proposals have usually been rejected. You are welcome to keep on rejecting them officially as long as you continue accepting the ideas. I do not need credit in such cases, but the amateur radio service needs the improvements.

In summary, I propose establishing two new Novice bands (20 and 30 meters), expanding two existing Novice bands (40 and 80 meters), and leaving two current Novice bands (10 and 15 meters) as they are. Your careful consideration of these important points would be greatly appreciated.

Sincerely,

*William G. Welsh*

\* NOW 200 WATTS PEP OUTPUT

William G. Welsh - W6DDB  
W6LS Instructor



2814 Empire Avenue  
Burbank, California 91504-3297  
7 May 1987

Federal Communications Commission  
Personal Radio Branch  
1919 M Street, N.W.  
Washington, D.C. 20554

Subject: Amateur Radio Operator License  
Examination Code Tests

Dear Sir:

I am pleased that you separated Technician and General written examination material. I had suggested this step in two previous letters I wrote to you about 30 years ago. I hope you will continue this trend and separate code tests. At present, Novice and Technician applicants must pass element 1-A, which is 5-wpm. At present, General and Advanced applicants must pass element 1-B, which is 13-wpm. The Extra Class requirement is element 1-C at 20-wpm.

I believe a separate code test requirement is appropriate for each class of license. I think the code test speeds would be appropriate at 4 (Novice), 8 (Technician), 12 (General), 16 (Advanced), and 20 (Extra Class).

Most beginning Novices send code about 3-wpm. A code test at 4-wpm is more appropriate to their initial needs. The receiving test should be restored to forward-reading plain language text that just includes letters. Punctuation marks, numerals, and work signs were previously restricted to the sending test, which should still be suitable. The international requirement is that all applicants for amateur radio operator licenses, that involve operating privileges below 30 MHz, must prove their ability to receive (by ear) and to send (by hand) the International Morse Code. I believe that this requirement can be met more easily at the Novice level than in the VEC (Technician thru Extra Class) test program.

The jump from 5 to 13 wpm is drastic. Allowing candidates to move up in increments of 4-wpm should be beneficial. The proposed 8 and 12 wpm Technician and General code test requirements should help increase upgrades.

Similarly, the difference between 13 and 20 wpm is pronounced. The proposed 16-wpm Advanced code test requirement would be more conducive to upgrading to the 20-wpm Extra Class requirement.

Each step up in license grade entails increased operating spectrum wherein code may be used. It seems reasonable that the associated code test speed requirements should be separate and evenly stepped from the lowest to the highest license.

I have conducted amateur radio operator licensing courses every year since 1948. I am very active helping students. I know their problems and needs.

I hope you will give this matter prompt attention.

Sincerely,

*Wm. G. Walsh*

Wm. G. Walsh - W6DDR

Telephone Numbers:

Club	818-842-1863
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copy: ARRL  
W6DDR FCC File  
W6LS FCC File

exam) to obtain Novice privileges above 30 MHz. The new code-free Technician would require only Elements 2 and 3A to obtain VHF and higher spectrum ...except the two meter band would not be authorized.

**RM-6991 - Received: May 9, 1989**

**Larry Ballentine, N5BZB (504 Ruth Dr., Bryant AR 72022)**

...wants to replace the code receiving examination with a code recognition requirement "...to keep the traditions of amateur radio intact ...while eliminating the objection to code speed reception." He proposes a written test where dots-and-dashes could be matched up with code characters. Ballentine proposes a 90% pass rate. He wants the code recognition procedure to extend to all amateur classes to "...satisfy the international requirement below 30 MHz [that] a person have a knowledge of code..."

Ballentine previously petitioned for the complete elimination of Morse code proficiency for all license classes. "I believe that a person should not be excluded from the multitude of other forms of amateur radio on the basis of ability in just one area."

**RM-6992 - Received: June 1, 1989**

**Bill Welsh, W6DDB (2814 Empire Ave., Burbank, CA 91504)**

Welsh, a well known amateur radio writer and educator, is also an avid CW operator. "...most of my last 40 years on the amateur bands have been completely devoid of voice contacts." His petition was very imaginative and creative.

Welsh notes the *Global Maritime Distress and Safety System* is being implemented on the high seas during 1993. He suggests that the time frame being adopted for phasing out code in the Maritime Service "...be used to change out test requirements in ways that will guarantee that future licensees will have proven operating capabilities."

He suggests five entry-level amateur "mode licenses" ....code, facsimile/pulse, teletype, television and voice. The license examination should consist of a written test and a satisfactory on-the-air demonstration in each mode. The current Novice through Extra license classes and band segments should be eliminated.

In addition to earning additional emission privileges

when one passes a mode upgrade test, the licensee would gain additional bands. As an example, Welsh suggested the following frequency privileges:

*One mode license:* 160, 17, 12 meter ham bands;  
*Two mode license:* Above bands plus plus 80, 30 and 6 meters;

*Three mode license:* Above bands plus 40, 2, 1-1/4 meters and higher frequency bands;

*Four mode license:* Above bands plus 10 and 15 meters;

*Five mode license:* All ham bands including 20 meters.

Each current Extra Class licensee should receive a license with all mode endorsements. Current Advanced/General licensees would receive new licenses with all but the facsimile/pulse endorsement. Present Novice/Technician levels would get two mode code/voice licenses. The current Group A (Extra), Group B (Advanced), Group C (General/Technician) and Group D (Novice) call sign formats could be used with 5, 4, 3/2 and single mode licenses.

Welsh said he would miss the code as a licensing requirement, but this system would allow each applicant to be examined for the specific mode he/she wants to operate.

**RM-6993 - Received: June 7, 1989**

**John McCord, N1CVN (957 Flotilla Club Dr., Indian Harbour Beach, FL 32937)**

McCord, also a CW operator, not only holds an Extra Class ham ticket but a First Class Radiotelegraph license as well. He proposes an amateur licensing structure consisting of only three classes (Novice, Intermediate and General) and four test elements - two code (5 and 13 wpm) and two written (basic and advanced theory.)

McCord feels the Amateur Extra, Advanced and Technician class licenses should be totally eliminated. He wants the Novice class license to be restructured by eliminating the Morse code requirement, but requiring successful completion of a written examination consisting of the information now contained in Elements 2, 3(A) and 3(B) - the current Novice, Technician and General class written examinations. The newly restructured Novice Class would allow all amateur modes/spectrum above 220 MHz and digital (computer) privileges only from 50 MHz to 220 MHz.

45527 3rd Street East  
Lancaster, CA 93535-1802  
19 March 1990

National Conference of Volunteer Examiner Coordinators  
P. O. B. 565101  
Dallas, TX 75356-5101

Subject: FCC Notice of Proposed Rule Making  
FCC 90-62, dated 8 February 1990

Attention: Communicator Recommendations Committee  
Ray Adams - N4BAQ  
Fred Maia - W5YI  
R. C. Smith - W6RZA

Enclosure: Comments in Response to Your Questionnaire.

Gentlemen:

I am an Extra class amateur radio operator holding the station call sign W6DDB. I have also worked as a radio officer aboard U.S. Merchant Marine vessels; I am a WW-II veteran due to that service. My work experience includes a few years as a coastal harbor station (WBL, Buffalo, NY) operator where I also installed and serviced RMCA marine and aeronautical equipment. I am a member of QCWA and OOTC. As is common to most active amateurs, I have received many operating awards.

I have conducted amateur radio licensing courses every year since 1948. I run separate courses for each of the five current classes of amateur radio licenses. My work in the field of amateur radio operator licensing was primarily responsible for me receiving an Edison Award and a deForest Award.

In addition to extensive experience as an operator and an instructor, I have conducted amateur radio operator license examinations every year since 1951. Shortly after the VEC program was initiated, I became a volunteer examiner. I ran ARRL VEC Technician thru Extra Class examinations at Burbank, California from November 1984 to mid-1989. I refuse to participate in non-upgrade testing, which is why I resigned as an ARRL VE. I insist on knowing that the same person passes all examination elements required to obtain a license. I still conduct tests, but not as an ARRL VE.

I also write. More than 150 of my articles and items have appeared in print. Most of them have been printed in CQ, Ham Radio, QST, Worldradio, and 73. I wrote the licensing class instructors' guide which ARRL distributed, starting about 1958. My training materials (printed aids, examinations, and code practice tapes) have been sent to more than 2000 instructors, at their request.

In summary, the comments contained in the enclosure are based on many years of experience. I am sorry the ARRL's code-free license proposal prompted the FCC to consider implementing the drastic changes which are

PLEASE SEE MY SIGNATURE COMMENT IN G.I. LETTER

detailed in 90-62. However, I believe we can take advantage of this opportunity to make our Amateur Radio Service better than it is.

73.

*Wm. G. Welsh*

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Wm. G. Welsh - W6DDB  
ARRL Charter Life Member

copy: ARRL  
FCC - PRB  
N4BAQ  
W5YI  
W6RZA  
W6DDB

## ENCLOSURE TO W6DDB LETTER

The following comments are sequentially keyed to the corresponding subjects in your Communicator Class License Request for Comments Questionnaire.

### PART I

#### Paragraph 17

- 1.1 No.
- 1.2 No.
- 1.3 No.

#### Paragraph 18

- 2.1 Yes - about 60% to 40%
- 2.2 Study effort would be about equal.  
However, the current Novice tests do not adequately cover the modes a Novice is allowed to use. There is no emission mode a Novice is not allowed to use. A technically appropriate Novice written test would require 75 to 100 questions, which would make it difficult for beginners.
- 2.3 A single test is preferred.

#### 2/6 Meter Operation

- 3.1 It should provide added incentive to upgrade.
- 3.2 A flood of inexperienced operators would be detrimental.
- 3.3 No; put them on lightly used bands to increase activity on such bands, while minimizing congestion on the more popular bands. Let them upgrade to earn more favorable operating privileges.
- 3.4 No.
- 3.5 No.

#### Code Privileges for Communicators

- 4.1 No.
- 4.2 Yes, but they would not have earned the privilege to use code (AlA, not NØN-CW) on HF.
- 4.3 Not per existing international agreement.

#### VE/VEC Matters

- 5.1 No. Since the FCC would eliminate issuance of new Novice and Technician licenses, just upgrade and initial (Communicator) testing would be required. I do not believe the majority of the existing Novices will ever take an upgrade test.
- 5.2 Yes, it is reasonable.
- 5.3 Cover the technical and operating aspects related to each mode of emission the Communicator would be allowed to use. I believe a reasonably comprehensive Communicator written test would consist of about 100 (not 60) questions. A list of exact subjects does not appear to be warranted in answering this questionnaire, but I am willing to help generate such a list when it becomes needed.
- 5.4 Yes.

Additional Factors

6.1 Yes; I believe the entire approach is wrong, and I offer the following comments:

- A. Stopping the issuance of Novice and Technician licenses would stop the growth of our Amateur Radio Service. Renewable ten-year licenses would mask the significant decline that would occur. They also reduce upgrade incentive.
- B. My proposal (RM-6992) details a realistic revamping of our licensing and testing. It is neither a no-code or always-code proposal. It allows the candidate to apply for a license (or mode upgrade) which would authorize her/him to use a desired emission mode. Written tests would be directly related to desired operating modes, and the candidate would be required to demonstrate operating ability (on the air) to the satisfaction of a VEC team. Including an operating test should result in better activity by more new amateurs. The less popular bands would be allocated to initial (first mode) licensees to increase usage, with more popular bands awarded with each mode upgrade test one passes. Existing reserved segments for Extra, Advanced, and General class licensees would be eliminated. The initial assignments of bands could be made to suit the mode privileges earned by the candidate. In other words, do not issue 30 meter operating privileges (as an example) to someone who has only passed a voice mode test.
- C. Novice code activity has decreased a lot since Novices were given voice operating privileges. As the ten meter band slips down into the trough of the sunspot cycle, reduced communication possibilities will cause Novices to quit operating on ten meters. I believe most of the current Novice voice operators will simply stop operating. When 10 meters is dead, 15 meters closes early every day, limiting opportunities to operate, when one gets home weekdays. Soon after 15 meters drops out, foreign broadcast stations start blasting thru every 5 Kilohertz throughout the 40 meter Novice band, making it almost unusable to Novices. In addition, the 40 meter Novice band frequencies cannot be used by amateurs in ITU Regions I and III, which limits American Novices to possible Region II contacts. Half of the Novice 80 meter band is subject to interference from voice operation by foreign operators. Novices (and Technicians) need better code operating privileges. A 20 meter Novice band should be established at 14.10-14.15 Megahertz. It is about time this segment included significant American activity. A 20 meter Novice band would do more to increase long term Novice activity than any other change could accomplish. It is long overdue. The 30 meter band already has Novice type limitations and it should become a Novice code band to provide good communication opportunities when 15 meters has died but 40 meters is not yet open. The 40 meter Novice band should be extended 25 kHz to become 7075-7150 kHz. This would provide a segment free of powerful

international shortwave broadcasts; a segment wherein Novices could also contact ITU Region I and Region III DX amateurs. The 80 meter Novice band should be extended down 50 kHz to become 3650-3750 kHz, providing increased communication opportunities and added incentive to erect the required antennas. I believe any amateur who restricts herself/himself to Novice privileges will quickly agree that Novice code privileges are inadequate.

## PART II

- 1.1 No.
- 1.2 Yes, please see my RM-6992.
- 1.3 No, but I do believe we must convert a lot of inactive licensees into active operators.
  
- 2.1 Very little.
- 2.2 Almost never, per my experience.
  
- 3.1 The code requirement reduces the total of such possible operators, but any requirement has the same effect.
  
- 4.1 No. I recommended 5, 10, 15, and 20 wpm tests, respectively, as requirements for Novice/Technician, General, Advanced, and Extra Class. I think they are appropriate.
- 4.2 No. Please see preceding response.
- 4.3 The 20 wpm code tests are not a problem. We've had relatively few candidates, and testing does not take long. An Extra Class amateur should have proven superior operating capability, and code is a reasonable area for it.
  
- 5.1 No; please see my proposal. A two-license system would further reduce the percentage of amateurs holding the top license. There are definite advantages to a progression of licenses. However, the need for continuing the Technician license is questionable.
- 5.2 Yes; please see my comments about mode licenses/upgrades.
  
- 6.1 Additional operating privileges should continue to be earned by passing appropriate tests. However, I believe operating knowledge should be stressed in lieu of electronic theory knowledge.
- 6.2 Please see my reply to preceding 6.1 item.
  
- 7.1 Yes. The examination should be limited to matters directly related to the intended operation. However, the FCC may have included code and HF propagation questions in view of their comments about allowing Communicator class licensees to have some HF code operating privileges.
- 7.2 As previously stated, this response does not appear to warrant such detailed information. However, I am willing to supply it when it is needed.

- 8.1 The code tests have filtered out many prospective amateurs who would not expend the effort and time required to attain required proficiency. Code tests should continue to be required of candidates who want code operating privileges. Appropriate written and operating tests would assure that future amateurs are better than ever.

#### CONCLUDING REMARKS:

The Novice license served as a good gateway to amateur radio almost four decades. I am sure most American amateurs initially operated as Novices. The "enhancement" changes drastically reduced code operation by Novices, minimizing upgrades requiring increased code reception proficiency. The Novice license should be continued with operation again restricted to code/AlA, but with the improved/increased spectrum previously detailed in this response.

The Technician license should be discontinued. It was initially established as a VHF/UHF experimenter's license, but very few licensees have used it for this purpose.

The 5 wpm code reception capability requirement should be continued in regard to Novice license candidates. The code requirements to upgrade to General, Advanced, and Extra should become 10, 15, and 20 wpm, respectively, if they are to be retained.

The Novice written exam should be limited to questions related to code operation, if the other operating privileges are to be rescinded. If Novices are to retain their current privileges, and Novice licenses are to continue to be issued, the Novice written examination should be expanded (100 questions) to cover all aspects of their total privileges. If this latter approach is implemented, the communicator license would truly become the gateway license, since it could be made easier to pass than the Novice tests.

Do not allow code tests to be replaced by tests requiring prospective amateurs to prove knowledge of various data codes, operating procedures, and keyboard operating proficiency, as recommended by the Israel Amateur Radio Club and Ron Roden (4X4RR/G4GKO).

Adopting my mode privileges licensing proposal would eliminate the existing apparent problems. It is about time we allowed each prospective amateur to apply for a license/upgrade that will authorize her/him to operate the desired mode(s).



## QUESTIONNAIRE - PART I

This part of the questionnaire focuses on the specific requests for comments which are contained in the NPRM. It also addresses the problems associated with implementing the NPRM proposal as written.

The following questions are directed to specific FCC requests for comments:

**Discussion:** Paragraph 17 of the NPRM references a suggestion for a simplified no-code approach that would remove the code requirement from the present Novice class. This would result in a class having no HF privileges and the VHF/UHF privileges of the present Novice class. Existing Novice class would retain their HF privileges. The Technician class would become the entry level for HF operation. We are asked to carefully consider this approach.

- 1.1 Would there really be widespread resentment among present Novices?
- 1.2 Would you support such a proposal over that of the NPRM?
- 1.3 Do you agree with the FCC's assessment?

**Discussion:** Paragraph 18 offers a premise that, given a choice, most newcomers would opt for the Communicator rather than the Novice license. We are asked to validate that premise. We are also asked to supply factual information on the time required for a newcomer to prepare for Communicator vs. Novice class.

- 2.1 Do you believe most newcomers would opt for Communicator?
- 2.2 If you have experience instructing newcomers, what factual information can you supply on the relative difficulty of the old Novice 1A+2 and the new Communicator 3A of 60 questions?
- 2.3 Would one large or two smaller tests be best from a training standpoint?

**Discussion:** Communicator class is not permitted to transmit on the 2m and 6m bands. The class would acquire authority for these privileges by simply passing the 5 WPM code test. We are asked in paragraph 20 to comment on the effect of excluding Communicator class from these bands.

- 3.1 What is the effect of excluding Communicator class licensees from these two popular bands?
- 3.2 What is the impact on amateur satellite and packet radio operation, a majority of which takes place in the 2 meter band?
- 3.3 Would it be advantageous to immediately blend newcomers into the most popular VHF bands where there is considerable mainstream amateur activity now...rather than on lightly loaded spectrum?
- 3.4 Do you believe that code proficiency is a realistic prerequisite for operation on these bands?
- 3.5 Would you support a proposal to extend Communicator frequency privileges to include these bands?

**Discussion:** Paragraph 21 asks for comments on a possibility of allowing the codeless Communicator cw

privileges on small segments of HF spectrum prior to his passing the code test. It is implied that on-the-air practice would allow him to more quickly reach a level where he could pass 5 WPM. He would be limited to domestic communications only. We are asked to comment on the desirability of this possibility.

- 4.1 Do you believe that this option would be beneficial?
- 4.2 Do you believe that on-the-air practice would really accelerate learning in the speed range 0 to 5 WPM?
- 4.3 Is this an enforceable provision in the Communicator operating rules?

The following questions relate to problems with the NPRM proposal that need solutions in order for VE/VECs to implement it with minimum change.

**Discussion:** 97.505(a)(1) allows the Novice class credit for the 30 written questions in the new 60-question element 3A. These are the questions he passed when he took the old element 2. The Committee believes that this would require flagging the Novice questions in the pool, would require separate design rules for Novice upgrade vs Communicator, and would wreak havoc on automatic exam generation software currently in widespread use. The committee suggests that the 60-question 3A as proposed be replaced with two smaller tests, retaining the identity of Element 2 and 3A. The Novice upgrade would take element 3A and the new Communicator would take 2 and 3A but not necessarily at the same VEC session, thus permitting the same degree of flexibility which existed for the Technician class.

- 5.1 Would you prefer the 60-question test as proposed? If so, how would you address the problems stated above?
- 5.2 Would you support the Committee's suggestion to the problem?
- 5.3 Fifty additional questions need to be added to the pool(s). What subjects do you recommend be covered?
- 5.4 Do you believe the added questions are necessary?

**Discussion:** The Committee has examined the NPRM in detail and finds no other obstacle to implementing the proposal as written. We do not, however, make any claims to omnipotence. We may have overlooked something.

- 6.1 Examine the NPRM carefully. Do you see any other problem that might seriously affect implementation?

## QUESTIONNAIRE - PART II

This part of the questionnaire deals with issues beyond the present scope of the NPRM proposal. We know that some of these issues are controversial and likely to generate strong emotional responses. They are offered as a stimulus for further thought in order that we, your Committee, might become better acquainted with the consensus of Amateur thinking. We are charged with the task of preparing a recommendation to the National Conference. We want it to be based on the best, most thoughtful, most objective inputs available.